

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**JOHN DOE, as next friend of JANE DOE,  
a Minor**

**Plaintiff,**

v.

**CLEBURNE INDEPENDENT SCHOOL  
DISTRICT, JENNIFER BAADSGAARD,  
and CHRISTOPHER WILLIAM FRANCIS**

**Defendants.**

**Civil Action No. 3:15-cv-00173-P**

**JOINT DISCOVERY PLAN REPORT**

COME NOW Plaintiff John Doe, as next friend of Jane Doe, a Minor, ("Plaintiff"), Cleburne Independent School District ("Cleburne ISD" or "the school district") and Jennifer Baadsgaard ("Baadsgaard") (jointly, "Defendants"), and, pursuant to Federal Rule of Civil Procedure 26(f), file this their Joint Discovery Plan Report. In support thereof, Plaintiff and Defendants state as follows:

**I.  
SUMMARY**

Counsel for Plaintiff (Greg Coontz) and Counsel for Cleburne ISD and Ms. Baadsgaard (Joshua Skinner) visited via telephone on April 7, 2015, regarding this case and in order to prepare this joint discovery plan report. Cleburne ISD and Ms. Baadsgaard have filed answers with the Court. Counsel for Plaintiff reported that Defendant Christopher Francis has been served, but Mr. Francis has not filed an answer or otherwise made an appearance in this case. Mr. Francis did not participate in the Rule 26(f) conference and Counsel for Plaintiff and Defendants are unaware whether Mr. Francis has retained counsel to represent him in connection with this litigation.

**II.**  
**REPORT**

**A. Initial Disclosures**

Plaintiff and Defendants have agreed to provide Rule 26(a) initial disclosures by May 11, 2015.

**B. Deadlines**

The parties request the following deadlines:

- |  |                  |
|--|------------------|
| 1. Amendment of Pleadings  | August 15, 2015  |
| 2. Discovery (including discovery motions)                               | February 8, 2016 |
| 3. Plaintiff's Expert Disclosures  | October 1, 2015  |
| 4. Defendants' Expert Disclosures  | November 1, 2015 |
| 5. Deadline for Filing Dispositive Motions and Motions to Strike Experts | March 14, 2016   |
| 6. Mediation   | April 1, 2016    |

**C. Possible Joinder of Additional Parties**

The parties do not anticipate the joinder of any additional parties.

**D. Discovery Issues**

Plaintiff and Defendants anticipate that they may need to request that the Court enter a protective order and/or an order requiring production of documents relating to Christopher Francis and/or Jane Doe. Counsel for Plaintiff and Defendants discussed the documents that they believe are necessary, proper and relevant to this litigation and were in general agreement. Many of the documents are held by non-party governmental entities and Counsel are endeavoring to determine whether the documents are available without a Court order.

**E. Estimated Trial Date and Length**

Plaintiff and Defendants estimate that trial would last 5-7 days and that the case should

be ready for trial by June, 2016. A jury trial has been demanded.

**F. Magistrate**

Plaintiff and Defendants do not consent to referral of the case to a magistrate judge for trial.

**G. Alternative Dispute Resolution**

Counsel for Plaintiff and Defendants discussed the possibility of settlement and believe that mediation may be helpful after sufficient discovery is conducted. Plaintiff and Defendants have agreed upon a mediator: Mary Burdin of Burdin Mediations. Plaintiff and Defendants anticipate conducting mediation by April 1, 2016.

Respectfully submitted,

/s/ J. Greg Coontz  
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**ATTORNEY FOR PLAINTIFF**

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**ATTORNEYS FOR DEFENDANTS  
CLEBURNE INDEPENDENT SCHOOL  
DISTRICT AND JENNIFER BAADSGAARD**

**CERTIFICATE OF SERVICE**

This is to certify that on the 8th day of April, 2015, I electronically filed the foregoing document with the clerk of the Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court, and that it reported that it was delivered to all attorneys of record.

/s/ Joshua A. Skinner  
**JOSHUA A. SKINNER**